

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

The Warwick Yard LLC,

Case No.17-36103-CGM

Debtor.

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**DECLARATION OF OLIVER PAPRANIKU**

Oliver Papraniku, declares under penalty of perjury under the laws of the United States of America, Judicial Code Section 1746, as follows:

1. I am a managing member of DEMS Partners, LLC ("DEMS"), which in turn is a managing member of OCYARD, LLC ("OCYARD"), the sole managing member of the Debtor.
2. I confirm all statements made in the Declaration of Mark Goldstein ("Goldstein Declaration").
3. On October 23, 2017, the Debtor held a meeting attended by Goldstein and myself on behalf of DEMS and Abbatine (telephonically) on behalf of MAAA, in which MAAA and Abbatine were removed from the Debtor's management.
4. We are preparing the monthly reports with the available data from the Debtor's DIP account and Debtor's DASHBOARD, which is the Debtor's field scheduling program.
5. Contrary to DLA's allegation, Goldstein and I believe that the best plan of reorganization for the Debtor is to continue its business. Our interests would continue with the successfully reorganized Debtor.
6. We are convinced that, when operated correctly, the Debtor can bring in substantially more revenue than it did prior to the management issues with Abbatine.
7. As stated in Goldstein's Declaration, all prior offers for leasing parts or all of the Debtor's facilities and premises or offers of partnering with the Debtor that Goldstein and I

presented to Abbatine, were rejected out of hand and against the interests of the Debtor.

8. Further, since Abbatine's expulsion as manager of the Debtor on October 23, 2017, I have also personally met with interested parties and received solid offers to partner with the Debtor, lease all or portions of the Debtor or invest in the Debtor that will give the Debtor the ability to successfully reorganize.

9. The offer annexed to the Cross-Motion appears to be an offer sufficient to purchase the lender's position, but it has no place among the real offers the Debtor is receiving. As part of Debtor's current management, Goldstein and I are focusing on the immediate need to bring in revenue, not in offers that benefit the lender only.

10. A trustee is not warranted under the circumstances.

Dated: October 27, 2017

/s/Oliver Papraniku  
Oliver Papraniku